

April 18, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of ex parte presentations - WC Docket No. 05-337*

Dear Ms. Dortch:

On April 17, 2007, Thomas A. Coates, Vice President, Corporate Development, for Dobson Communications Corporation (“Dobson”) and the undersigned made oral ex parte presentations to Scott Deutchman, legal advisor to Commissioner Michael Copps, and Nicholas Alexander, acting legal advisor to Commissioner Deborah Taylor Tate, regarding the issues before the Federal-State Joint Board on Universal Service involving reform of the high-cost universal service support system.

Dobson’s presentations in the meetings were consistent with its prior filings in this docket. From a global perspective, Dobson pointed out that it makes little sense to continue to send the bulk of high-cost support to incumbent local exchange carriers (“ILECs”), whose networks are mature and whose primary product (fixed-line voice) is on the downward slope of its life cycle. Even under “doomsday” scenarios involving explosive additional growth of support to competitive eligible telecommunications carriers (“CETCs”), ILECs would continue to receive the majority of support, and this cannot be justified from a public policy perspective.

More specifically, Dobson urged the Joint Board to take concrete steps to ensure that any “interim” reform measures in fact are interim. To ensure all stakeholders remain motivated to pursue more comprehensive reform, any interim reform measures must affect all support recipients evenhandedly. For this reason, Dobson urged the adoption of an across-the-board cap on high-cost funding, rather than a cap specific to CETCs.

Dobson also responded to claims by other parties that the existing caps on ILECs’ support under the High-Cost Loop (“HCLS”) and Interstate Common Line Support (“ICLS”) Mechanisms are comparable to a CETC-specific cap. The existing HCLS and ICLS caps were imposed after the ILECs’ networks were fully deployed and built out. Moreover, the ILECs’

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support under all the other support mechanisms remains completely uncapped. By contrast, as the Commission is well aware, wireless carriers are still in the process of deploying their networks in rural areas. Thus, even though the existing ILEC caps are not without impact, this impact pales in comparison to the punitive effect that would result from a CETC-only cap.

To ensure that any interim reform does not become permanent, Dobson also urged the Joint Board to include a recommendation that any interim mechanism expire on a date certain.

With regard to more comprehensive reform, Dobson reiterated its advocacy for a support mechanism based on an objective and efficient measure of the cost of providing service in high-cost areas. The true problem with the existing "identical support rule" is *not* that wireless ETCs receive support based on wireline costs, but rather that rural wireline carriers continue to receive support based on their own embedded costs, with insufficient discipline on their investments. Ultimately, providing rural wireline carriers with greater support because their stated costs are higher only rewards inefficiency and leads to a ballooning fund.

Finally, if the Joint Board nevertheless adopts a CETC-specific cap as an interim measure, Dobson urged the Joint Board to apply the cap at the *national* level in order to minimize distortions. Application of a cap over a smaller geographic area (such as a state or study area) would lead to arbitrary results depending upon existing support levels. Also, the existing ILEC caps on HCLS and ICLS are applied at the national level, so a national CETC cap, if adopted, should be applied at the same level.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By: /s/
L. Charles Keller

cc: Scott Deutchman
Nicholas Alexander